

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
ALEXANDRIA DIVISION**

**KAYLA J. GILES**

**CIVIL ACTION NO. 1:19-cv-01173**

**VERSUS**

**CHIEF JUDGE DEE D. DRELL**

**DELTA DEFENSE, L.L.C. and  
UNITED SPECIALTY INSURANCE  
COMPANY**

**MAGISTRATE JUDGE JOSEPH  
H. L. PEREZ-MONTES**

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**DEFENDANT’S, DELTA DEFENSE, L.L.C., ANSWER TO KAYLA J. GILES’  
INTERROGATORY WITH RESPECT TO JURISDICTION OF THE COURT**

COMES NOW, Defendant, Delta Defense, L.L.C., who responds to the Interrogatory propounded upon them by Plaintiff, Kayla J. Giles, as follows:

**INTERROGATORY NO. 1**

State the identity of each member of the limited liability company and the place of domicile of each member.

**ANSWER TO NO. 1**

Delta Defense, L.L.C. has two members, Timothy J. Schmidt, Sr. and Tonnie L. Schmidt. Both are residents of and domiciled in Wisconsin.

Respectfully submitted:

**KOEPPPEL CLARK**

/s/ W. Scarth Clark

**PETER S. KOEPPPEL (#1465)**

**W. SCARTH CLARK (#22993)**

**MEGAN B. JACQMIN (#33199)**

2030 St. Charles Avenue

New Orleans, Louisiana 70130

Telephone: (504) 598-1000

Facsimile: (504) 524-1024

*Attorneys for Delta Defense, L.L.C.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 6<sup>th</sup> day of December 2019, a copy of the above and foregoing pleading has been forwarded to all counsel of record via CM/ECF filing through the United States District Court system, email, and/or United States Mail.

/s/ W. Scarth Clark  
**W. SCARTH CLARK**